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October 16, 2020

VIA E-MAIL

Environmental Protection Agency

Re: Freedom of Information Act Request

To whom it may concern:

May this request have your immediate attention. Please be advised that our office represents AECOM Technical Services, Inc. ("AECOM"), regarding its work on the superfund site known as the Torrance Groundwater Remediation System ("TGRS"), owned by the Montrose Chemical Company of California ("Montrose"). AECOM acted as a consultant and as the contractor hired by Montrose to construct the TGRS. AECOM submits this California Public Records Act request for, inter alia, various reports and communications between the Environmental Protection Agency ("EPA") and Montrose and/or its construction manager for the TGRS, de maximis, inc. ("de maximis").

AECOM requests, pursuant Administrative Procedure 6380, the following information be provided, pursuant to the *Freedom of Information Act* (5 U.S.C. § 552) and the *California Public Records Act* (Gov't Code §§ 6250 et seq.). The term "Documents" as used herein includes any "writing" as defined by California *Evidence Code* § 250. Further, as used herein, Document means anything that is in written form or electronic form, including the originals (or any copies when originals are not available) and any other non-identical copies. We also request that the documents be provided on a rolling basis if possible.

- 1. All Documents consisting or comprising of or discussing EPA invoices or billings to Montrose on the TGRS for work performed by or for the EPA.
- 2. All Documents consisting or comprising or discussing permits to be acquired by Montrose for the TGRS.
- 3. All Documents consisting or comprising or discussing functional testing of the TGRS.
- 4. All Documents consisting or comprising or discussing required injection water quality standards for the TGRS, including but not limited to precluding the use of Eastern injection wells from the treatment system.

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These Documents can be provided in electronic format via email or in hard copy via U.S. Mail or FedEx, although email is preferred. We also are available to pick up the documents when they are available.

In accordance with the terms of both the *Freedom of Information Act* and the *California Public Records Act*, we agree to pay all fees associated with this request. In order to assist you in determining my requester category to assess fees, you should know that I am affiliated with a private company (law firm) and am seeking this information for my client (AECOM) for use in my client's business; we therefore believe that the fee category should be commercial-use requester. My contact information is:

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Thank you in advance for your cooperation. Please provide this office notification as to when we should expect the documents. Your prompt attention to this request is appreciated. Please do not hesitate to contact me if you have any questions.

Sincerely,

John H. Conrad Associate

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